



February 7, 2017

Mr. Malcom Dougherty
Director
California Department of Transportation
1120 N Street
Sacramento, CA 94273

**RE: Proposal to Amend California Code of Regulations Title 21, Division 2, Chapter 16:
Compatibility Specifications for Automatic Vehicle Identification Equipment**

Dear Mr. Dougherty,

The Golden Gate Bridge, Highway and Transportation District (the District) would like to express its strong support to the California Department of Transportation (Caltrans) for its effort to transition from the current automatic vehicle identification protocol specification documented in California Code of Regulations, Title 21, Division 2, Chapter 16, (commonly referred to as the "Title 21 protocol"), to the leading-edge technology and associated benefits as offered by the International Standards Organization (ISO) 18000-63 protocol, (known as the "6C protocol").

The current Title 21 protocol was developed over 20 years ago to comply with the California legislative mandate for electronic tolling. However, the protocol has limitations, including the high cost of transponders, the limited number of vendors that produce transponders and readers, and the lack of certification requirements which has resulted in interoperability performance issues. Moving to the 6C protocol would help address several of these issues and the District has worked with the California Toll Operators Committee (CTOC) to ensure that we are collaborating with our peers to implement a modern tolling technology solution that allows for the best possible interoperability through use of a current, non-proprietary, and proven protocol.

The CTOC Executive Committee authorized the Technical Subcommittee to develop the CTOC 6C Transition Plan to examine the feasibility and timeline of a transition from the current Title 21 protocol to the 6C protocol. The District has participated in that transition planning process.

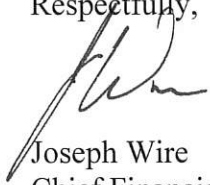
We have determined that the transition deadline of January 2019 is reasonable to allow the District to incorporate the 6C protocol into our new open road tolling system that is currently in procurement. We urge Caltrans to continue its active efforts to complete the regulatory change currently under consideration. This change is supported by all the California tolling agencies and backed by the experience of our peers in other states.

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If our staff can be of any assistance, please contact Jef Nazareno, Electronic Revenue Program Manager, at 415-923-2305.

Respectfully,

A handwritten signature in black ink, appearing to read "J. Wire", is written over the printed name.

Joseph Wire
Chief Financial Officer
Golden Gate Bridge, Highway and Transportation District

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FEB 10 2017
DIRECTOR'S OFFICE